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Application granted.

Plaintiffs' time to respond to Defendants' 56.1 Statement is extended to and including July 29, 2022, Defendants' time to file a pre-motion conference letter is extended to and including August 16, 2022, and Plaintiffs' time to respond to the pre-motion conference letter is extended to and including August 23, 2022.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 102.

July 27, 2022 SO ORDERED.

A handwritten signature in black ink, appearing to read 'PHILIP M. HALPERN'.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
July 27, 2022

VIA ECF ONLY

Hon. Philip M. Halpern
The Hon. Charles L. Brieant, Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re. *Bayer v. County of Dutchess, et al.*
7:19-cv-03383 (PMH)(AEK)

Dear Judge Halpern:

The Russell Friedman Law Group, LLP represents Plaintiffs in connection with the above-referenced action. The present application is a joint request.

We write to respectfully request that the time within which Defendants pre-motion letter pursuant to Rule 4.E.vii shall be file is extended to August 16, 2022.

Presently, Defendants' pre-motion letter is due July 28, 2022. The basis for the request is that Plaintiffs' response to Defendants' Rule 56.1 statement was delayed due to the recent passing of undersigned's father-in-law. Approximately two weeks ago undersigned's father-in-law was hospitalized at Good Samaritan Hospital due to COVID. His underlying health conditions made him a high-risk patient. As a result, on several occasions, I had to be away from the office. This past week, my father-in-law was transferred into hospice and in the morning of Friday passed away. Ms. Kimberly Hunt-Lee was gracious enough to allow me additional time to submit Plaintiff's response to Defendants' 56.1. However, this delay effects Defendants' ability to submit their pre-motion letter.

Therefore, it is respectfully requested that Defendants' time to file the pre-motion letter be extended until August 16, 2022. It is further respectfully requested that Plaintiffs' response to Defendants' 56.1 be extended to July 29, 2022, and that Plaintiffs' response to Defendants' pre-motion letter be also extended.



July 26, 2022

Page 2

Thanking the Court for its time and consideration, I remain

Respectfully,
THE RUSSELL FRIEDMAN LAW GROUP, LLP

/s/ Pablo A. Fernandez

Pablo A. Fernandez

cc: Kimberly Hunt-Lee, Esq.
Attorney for Defendants